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18 Teodoro Nguema Obiang Mangue

19 and Sweetwater Malibu, LLC

20 UNITED STATES DISTRICT COURT

21 CENTRAL DISTRICT OF CALIFORNIA

22 WESTERN DIVISION

23 UNITED STATES OF AMERICA,

24 Plaintiff,

25 vs.

26 ONE MICHAEL JACKSON SIGNED  
27 THRILLER JACKET AND OTHER

28 MICHAEL JACKSON

MEMORABILIA; REAL PROPERTY

LOCATED ON SWEETWATER

MESA ROAD IN MALIBU,

CALIFORNIA; ONE 2011 FERRARI

599 GTO,

Defendants.

CASE NO. 2:13-cv-09169-GW-SS

**DECLARATION OF BRIAN M.  
WHEELER IN SUPPORT OF  
CLAIMANTS' MOTION TO  
DISMISS VERIFIED COMPLAINT  
FOR FORFEITURE *IN REM***

Hon. George H. Wu

Hearing Date: March 13, 2014

Time: 8:30 a.m.

Place: Courtroom No. 10

DECLARATION OF BRIAN M. WHEELER

I, Brian M. Wheeler, declare as follows:

1. I am a member of the bar of the State of California and of this Court and an associate at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Claimants Vice President Teodoro Nguema Obiang Mangue and Sweetwater Malibu, LLC. I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently hereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of the document bearing Bates No. SENATE-PSI-00070805-920, as produced by the United States.

3. Attached hereto as Exhibit 2 is a true and correct copy of a declaration and exhibits thereto as electronically served by the government on May 3, 2013, and retrieved from the Court's Electronic Case File for Case No. CV 11-3582-GW as ECF Document 91 (Declaration of Amanda Graf), 91-5 (Graf Decl. Ex. 5), 91-6 (Graf Decl. Ex. 6).

4. Attached hereto as Exhibit 3 is a true and correct copy of a declaration and exhibit thereto as electronically served by the government on May 3, 2013, and retrieved from the Court's Electronic Case File for Case No. CV 11-3582-GW as ECF Document 86 (Declaration of Robert Manzanares), 86-3 (Manzanares Decl. Ex. 3).

5. Attached hereto as Exhibit 4 is a true and correct copy of the document bearing Bates No. DOJ\_0000174-177, as produced by the United States.

6. Attached hereto as Exhibit 5 is a true and correct copy of the certified transcript for the hearing in Case No. CV 11-3582-GW on January 28, 2013, in the courtroom of the Honorable George H. Wu.

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1 I declare under penalty of perjury under the laws of the United States of  
2 America that the foregoing is true and correct.

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4 Executed on February 13, 2013, at Los Angeles, California.

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Brian M. Wheeler